

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA

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SOUTHERN DISTRICT  
OF INDIANA  
LAUREN BRIGGS  
CLERK

SHAUNNE OLSON,

Plaintiff,

4:06-CV-0154 SEB - WGH

-vs-

Case No:

HORNBLOWER MARINE SERVICES, INC.,

Defendant.

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O'BRYAN BAUN COHEN KUEBLER  
DENNIS M. O'BRYAN (P30545)  
Attorney for Plaintiff  
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**COMPLAINT**

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN COHEN KUEBLER, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.
2. Jurisdiction is founded under the Jones Act (46 USC 688) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure, and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

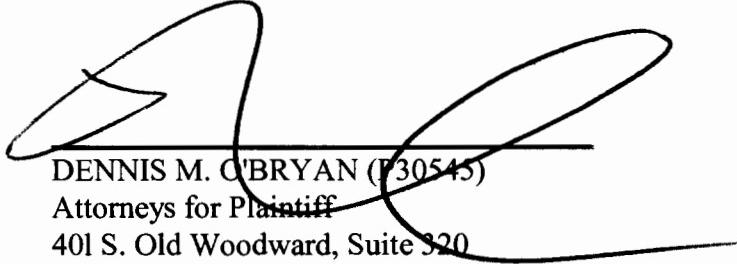
4. On or about May 25, 2006, Plaintiff was in the course of employment when he was required to engage in lifting activities in a manner awkward for the purposes intended requiring improper body mechanics when as a result of said failure to provide a safe place to work and seaworthy vessel he was injured with Defendant thereafter refusing, neglecting or otherwise not fulfilling its obligation to provide maintenance and cure thereby aggravating the underlying condition.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, inter alia, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Found;
- i. Maintenance, cure, wages and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN COHEN KUEBLER



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Dated: October 18, 2006

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY

SHAUNNE OLSON,

Plaintiff,

-vs-

Case No:

HORNBLOWER MARINE SERVICES, INC.,

Defendant.

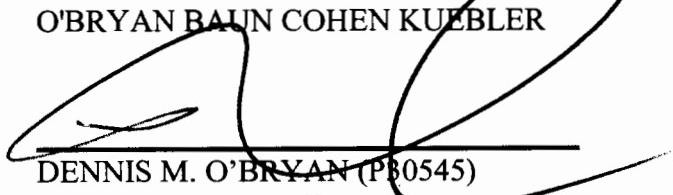
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DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN COHEN KUEBLER, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN COHEN KUEBLER  
  
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